



Indiana Department of Education
SUPPORTING STUDENT SUCCESS

January 3, 2011

Mr. Daniel Tanoos
Vigo County School Corporation
686 Wabash Avenue
Terre Haute, Indiana 47804

Dear Mr. Tanoos:

On September 9, 2010, the Indiana Department of Education's (IDOE) monitoring team commenced an on-site monitoring review of the Vigo County School Corporation's administration and oversight of McKinney-Vento projects, in accordance with the McKinney-Vento Education for Homeless Children and Youth Act. Enclosed is a report based upon this review.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Vigo County School Corporation is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, the corporation must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will provide technical assistance as appropriate.

We would like to thank you and your staff, as well as the staff at Ryves Hall Youth Center for the work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities to assist in the effective delivery of education services for students experiencing homelessness.

Sincerely,

Amy Bush, Director
Leneé Reedus, Supervisor
Office of Title I Academic Support

cc: Valarie Bailey, Jim Edwards

**Indiana Department of Education
McKinney-Vento Education for Homeless Children and Youth Monitoring**

Monitoring Date: September 9, 2010

Monitoring Team: Christina Endres & Leneé Reedus

Background Information

The Indiana Department of Education (IDOE) conducted an on-site monitoring visit with Vigo County School Corporation regarding the McKinney-Vento Project Grants on September 9, 2010. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with homeless education laws and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

1. Local educational agencies will designate an appropriate staff person, who may also be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths. 42 USC 11432 (g)(J)(ii)
2. Each liaison for homeless children and youth shall ensure homeless children and youths are identified by school personnel and through coordination activities with other entities and agencies. 42 USC 11432 (g)(6)
3. The local educational agency shall implement a coordinated system for ensuring that homeless children and youths are promptly provided necessary services, including transportation. 42 USC 11432 (e)(3)(E)
4. In order to help low-achieving children meet challenging achievement academic standards, each local educational agency plan shall include a description of how the local educational agency will coordinate and integrate services provided with other educational services at the local educational agency or individual school level, such as services for homeless children, a description of the services the local educational agency will provide homeless children, including services provided with funds reserved. 20 USC 6312
5. Students experiencing homelessness have the right to immediate enrollment in the school of origin or the local school. LEAs must have a process for resolution of disputes and provide a statement of rights to homeless youth or their parent/guardian. In order to expedite enrollment, LEAs must enroll students even if documentation normally required is absent. 42 USC 11432 (g)(3)(E); 42 USC 11432 (g)(3)(C); 42 USC 11432 (e)(3)(C)
6. Liaisons for homeless children and youth shall, as a part of their duties, coordinate and collaborate with State coordinators and community and school personnel responsible for the provision of education and related services to homeless children and youth. Development and growth of collaborative relationships should be evident. 42 USC 11432 (g)(6)(C)
7. Local educational agencies have developed and shall review and revise policies to remove barriers to the enrollment and retention of homeless children and youths in school. 42 USC 11432 (e)(3)(E)(iv); 42 USC 11432(g)(1)(I)
8. The Local Education Agency subgrant plan for services to eligible homeless students meet all requirements. (fiduciary) 42 USC 11432(e)(1); 42 USC 11433

During the on-site visit, IDOE spent time interviewing staff from the Vigo County School Corporation and Ryves Hall Youth Center at the district's central office. IDOE also reviewed documents from Vigo County School Corporation and Ryves Hall Youth Center pertaining to implementation of state and federal homeless education laws including the use of grant funds. Based on the above information, our report follows.

Monitoring Topic 1: Local educational agencies will designate an appropriate staff person, who may also be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths.

Background

IDOE interviewed the McKinney-Vento Liaison and the director of Ryves Hall Youth Center.

Statutory Requirement: McKinney-Vento Liaison requirements are located in 42 USC 11432(g)(J)(ii) and I.C. 50-1-3.

Areas of Compliance

Meets Standard: Valarie Bailey, Student Services Assistant Director, is registered with the IDOE as the McKinney-Vento Liaison for the district. At the time of the interview, no contact information related to the homeless program was listed online. However, by October 6, 2010, a new link was created to provide families with information related to student rights and Ms. Bailey's information as the liaison.

Recommendation: It is recommended that Ms. Bailey's contact information be posted on the homepage. Currently, while the information is posted online, it is not on the main page for the website. Posting it on the homepage would be more consistent with the intent of I.C. 50-1-3.

Monitoring Topic 2: Each liaison for homeless children and youth shall ensure homeless children and youths are identified by school personnel and through coordination activities with other entities and agencies.

Background

IDOE interviewed the McKinney-Vento Liaison and the director of Ryves Hall Youth Center.

Statutory Requirement: McKinney-Vento Liaison requirements pertaining to identification and coordination are located in 42 USC 11432 (g)(6). Evidence provided must include a housing questionnaire or similar documentation, or documented communication with local community services providers, or proof of events targeted to homeless students. A description of the process used to ensure data accuracy must also be provided.

Areas of Compliance

Meets Standard: Evidence in the form of emails and letters sent to the local shelters and school registrars was provided. A copy of the data tracking sheet was also provided to support the discussion regarding data accuracy.

Monitoring Topic 3: The local educational agency shall implement a coordinated system for ensuring that homeless children and youths are promptly provided necessary services, including transportation.

Background

IDOE interviewed the McKinney-Vento Liaison and the director of Ryves Hall Youth Center.

Statutory Requirement: McKinney-Vento Liaison requirements pertaining to the LEA's coordinated system for service delivery is located in 42 USC 11432 (e)(3)(E). Evidence must include a written policy for transportation. Additional evidence may include bus routes, inter-district transportation agreements, contracts with transportation providers.

Areas of Compliance

Meets Standard: The district uses the student rights document as the transportation policy. The district also provided evidence of a student tracking sheet that indicated students in need of transportation, number of days they received transportation, the mileage, school, costs, and start and end dates.

Recommendation: It is recommended the transportation policy be more formalized and go beyond the brief statement in the rights notification.

Monitoring Topic 4: In order to help low-achieving children meet challenging achievement academic standards, each local educational agency plan shall include a description of how the local educational agency will coordinate and integrate services provided with other educational services at the local educational agency or individual school level, such as services for homeless children, a description of the services the local educational agency will provide homeless children, including services provided with funds reserved.

Background

IDOE interviewed the McKinney-Vento Liaison and the director of Ryves Hall Youth Center.

Statutory Requirement: Requirements pertaining to the coordination with other programs may be found in 20 USC 6312. Evidence must include information from the Title I application indicating coordination and set-aside.

Areas of Compliance

Meets Standard: The Title I, Part A application indicating a set-aside for homeless students was provided.

Recommendation: Planning for activities to serve homeless students should be done in a collaborative manner, with regular updates through the course of the year to ensure services are adequate and funds are spent. It is recommended the McKinney-Vento staff and Title I staff plan together to ensure services are provided that will best use funds and increase student achievement.

Monitoring Topic 5: Students experiencing homelessness have the right to immediate enrollment in the school of origin or the local school. LEAs must have a process for resolution of disputes and provide a statement of rights to homeless youth or their parent/guardian. In order to expedite enrollment, LEAs must enroll students even if documentation normally required is absent.

Background

IDOE interviewed the McKinney-Vento Liaison and the director of Ryves Hall Youth Center.

Statutory Requirement: Dispute resolution, enrollment, and student rights requirements are located in 42 USC 11432 (g)(3)(E), 42 USC 11432 (g)(3)(C) and 42 USC 11432 (e)(3)(C). Evidence must include a statement of student rights and a dispute resolution policy. Supplemental evidence may include a sample letter explaining a decision to deny enrollment or services, including the notification of a student's right to appeal; letters or memoranda to assist with enrollment; fee waivers; or timeline waivers for medical, school, or other records.

Areas of Compliance

Meets Standard: The statement of rights and dispute resolution policy were combined into one document for parents. An email sent by the liaison to the buildings to assist with enrollment issues for homeless students was also provided. The liaison and partner agency were able to show a copy of an IDOE attendance memo used to assist with enrollment.

Recommendation: Much of the process for helping students enroll or resolving disputes is informal. It would be advisable for the district to create a more formal policy for inclusion with the school board policies or staff procedures. This would help institutionalize practices and protect students in times of staff turnover.

Monitoring Topic 6: Liaisons for homeless children and youth shall, as a part of their duties, coordinate and collaborate with State coordinators and community and school personnel responsible for the provision of education and related services to homeless children and youth. Development and growth of collaborative relationships should be evident.

Background

IDOE interviewed the McKinney-Vento Liaison and the director of Ryves Hall Youth Center.

Statutory Requirement: A description of liaison responsibilities for coordination and collaboration with other persons and agencies is located in 42 USC 11432 (g)(6)(C). Evidence must include MOU's or contracts with community agencies, or flyers and other evidence of outreach efforts. Supplemental evidence must include one of the following: resource lists, documentation that a clinic provided services to a homeless student, or proof of payment for a school related activity paid for a student through school funding.

Areas of Non-Compliance

Below Standard: While it is evident through anecdotal evidence that the McKinney-Vento project thru Vigo County School Corporation does have a long history of collaborating and coordinating with others, no quantitative evidence was provided to support this area.

Required Action: Vigo County School Corporation must maintain records of services provided or collaborative activities to serve homeless students.

Monitoring Topic 7: Local educational agencies have developed and shall review and revise policies to remove barriers to the enrollment and retention of homeless children and youths in school.

Background

IDOE interviewed the McKinney-Vento Liaison and the director of Ryves Hall Youth Center.

Statutory Requirement: A description of the responsibility to remove barriers and revise policies may be found in 42 USC 11432 (e)(3)(E)(iv) and 42 USC 11432(g)(1)(I).

Areas of Compliance

Meets Standard: Adequate information regarding policies and procedures that had been changed to meet student needs was provided. Most notably, information regarding transportation, immunizations, and free meals was provided.

Monitoring Topic 8: The Local Education Agency subgrant plan for services to eligible homeless students meet all requirements. (fiduciary)

IDOE interviewed the McKinney-Vento Liaison, the district accounting supervisor, and the director of Ryves Hall Youth Center.

Statutory requirements for fiscal procedures may be found in 42 USC 11432(e)(1) and 42 USC 11433. Evidence required included a statement of actual expenditures made from grant funds.

Areas of Non-Compliance

Internal Control: Vigo County School Corporation did not provide evidence that it maintains adequate internal control. School budget sheets are completed without sufficient detail. The IDOE found that the McKinney-Vento grant budget did not match the final expenditure report. Vigo County School Corporation was not able to provide detailed invoices from its subcontract partner indicating the expenditures as outlined in the McKinney-Vento grant budget.

Required Action: Vigo County School Corporation must strengthen internal controls to ensure that items are being posted to the ledger as approved in the budget. New reimbursement procedures should be implemented immediately to ensure that invoices are correctly coded and aligned with the McKinney-Vento grant budget in the district ledger.